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MCDERMOTT, WILL & EMERY

A Partnership Including
Professional Corporations
600 13th Street, N.W.
Washington, D.C. 20005-3096
202-756-8000
Facsimile 202-756-8087
<http://www.mwe.com>

Evan M. Migdail
Attorney at Law
emigdail@mwe.com
202-756-8033

Boston
Chicago
Los Angeles
Miami
Moscow
Newport Beach
New York
St. Petersburg
Silicon Valley
Vilnius
Washington, D.C.

September 22, 1999

Michael Marinelli, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Supplement to
AOR 1999-20

Re: Advisory Opinion Request – EQUIPAC

Dear Mr. Marinelli:

This is in response to your request for additional information in connection with the advisory opinion request submitted on June 11, 1999 on behalf of the Equitable Companies, Inc. Political Action Committee ("EQUIPAC").

Equitable provides two programs under which its employees, including the insurance agents who are discussed in the AOR, may own company stock. These are the company stock fund component of the company's 401(k) retirement plan, and a separate stock purchase plan.

You indicated that the Commission does not require that we provide specific numbers as to how many agents participate in these programs.

I hope this information is responsive to your request. Please do not hesitate to contact me if you need any additional information.

Sincerely



Evan M. Migdail

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